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18th September 2018

Dear Sir / Madam,

Town and Country Planning Act 1990
Welwyn Hatfield Local Plan Examination
LUC Welwyn Hatfield Green Belt Study Stage 3

Thank you for the opportunity to comment on the August 2018 'Welwyn Hatfield Green Belt Study' prepared by LUC and commissioned following receipt of the Inspector's December 2017 Green Belt review note.

Dandara Ltd raised soundness concerns within our Regulation 19 representations (see Section 4.0), expanded upon within our Stage 2 Hearing Statement and verbally at examination, that the Council had not considered the potential of 'washed over' Green Belt settlements to deliver new homes, excluding them from assessment on the premise that they were considered automatically unsustainable. This approach equated the Green Belt status of settlements with their sustainability without due assessment and in conflict with national policy.

This approach had unnecessarily hamstrung the ability of the Council to deliver full OAN and to maintain a five year housing land supply which is reliant upon immediately deliverable short and medium term sites. It was also in conflict with para. 86 of the 2012 NPPF which advises as follows:

"If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt".

Dandara Ltd has instructed Define to undertake a review of the LUC study with particular reference to land off New Road in Stanborough which is being promoted for residential development through the Local Plan as an

omission site. The report is submitted for the consideration of the Inspector alongside this covering letter and makes the following observations:

- 16 'washed over' Green Belt settlements were assessed to consider the contribution the open character of the village makes to the openness of the Green Belt in the context of NPPF para. 86;
- Of the 16 assessed, 7 settlements were considered not to contribute to the openness of the Green Belt with Stanborough exhibiting the joint lowest level of harm, being 'low', for the existing village to be inset;
- Land off New Road, Stanborough was assessed as P38 with its development considered to represent 'moderate' harm to the Green Belt;
- This 'moderate' harm represents the lowest degree of Green Belt harm associated with development outside the existing built-up area for those 16 'washed over' Green Belt settlements considered;
- When considering all of the potential parcels contained in the LUC report outside those associated with 'washed over' Green Belt settlements, only 23 perform better representing 13% of parcels with 'moderate to low' harm.

Whilst the LUC Green Belt Study identifies land off New Road, Stanborough as performing only 'moderately' towards Green Belt purposes, the Define report which accompanies these representations suggests that the contribution of the land towards 'assisting in the safeguarding of the countryside from encroachment' purpose is incorrectly assessed. Whilst the site is considered to make a 'significant contribution' towards this purpose, when one compares land off New Road in Stanborough against the definition of 'significant contribution' for this purpose – *"land that contains the characteristics of open countryside and relates strongly to the wider countryside, has a sense of separation from the settlement and lacks urbanizing development"* - it is evident that an error has been made (table 3.5, pg. 29).

Land off New Road as P38 is clearly not separated from the settlement as it is enclosed on three sides by existing housing and for the same reason cannot be considered to lack urbanising development. The Define report concludes at para 2.8 that *"if this score was accurately recorded as having a partial contribution, instead of a significant one, it is likely that the scenario for this site being developed would reduce to moderate-low harm which ... is within the lowest 13% of development scenarios in terms of Green Belt harm"*.

Dandara Ltd considers that the LUC study has positively responded to the written request of the Inspector dated December 2017 by considering whether any settlements not previously considered for growth due to their 'washed over' Green Belt status should be removed from the Green Belt having regard to the provisions of para. 88 of the NPPF. If the answer is that they should be removed, as with Stanborough, the study then considers the potential for such settlements to accommodate growth without undue harm arising to Green Belt purposes. Land off New Road, Stanborough represents a parcel of land located in a village whose open character does not contribute to the openness of the Green Belt and the development of which would, at worst, result in 'moderate' harm to the Green Belt, a score that should be adjusted down to 'moderate-low' as explained in the preceding two paragraphs.

We look forward to hearing from the Council about how they intend to proactively take the conclusions of the additional LUC Green Belt work to boost the number of new homes deliverable within the Plan period in locations that are less sensitive from a Green Belt perspective.

Dandara Ltd has provided to the Council under separate cover an Accessibility and Sustainability Technical Note prepared by RPS which demonstrates that Stanborough is an inherently sustainable location for growth, having regard to objective assessment tools such as 'walkable neighborhoods', and that there is no relationship between the 'washed over' status of Green Belt settlements and their sustainability to accommodate growth. Land off New Road, Stanborough offers an opportunity to deliver much needed new housing on land that does not significantly contribute to Green Belt purposes and in a manner that accords with the NPPF para. 84 objective of promoting sustainable patterns of development.

I trust these additional representations to the August 2018 LUC Green Belt Study are of interest, but if you require any additional information, please do not hesitate to contact me.

We would be grateful for an opportunity to provide verbal evidence at the November Green Belt Review Hearing Sessions.

Kind regards

Yours sincerely

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